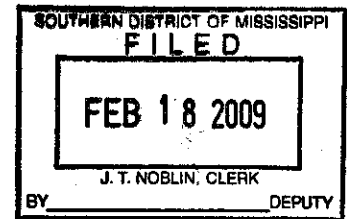


IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. *3:09cr18DPJ-LRA*

WILEY RANDOLPH KUYRKENDALL

26 U.S.C. § 7203

**The Grand Jury charges:**

COUNT 1

During the calendar year 2002, in Rankin County in the Jackson Division of the Southern District of Mississippi, the defendant, **WILEY RANDOLPH KUYRKENDALL**, received gross income of approximately \$109,878.00, which was substantially in excess of the minimum filing requirement of \$13,850.00 for Married Filing Jointly filing status in the calendar year 2002, and that by reason of such gross income, the defendant was required by law, following the close of each calendar year and on or before April 15 of the following year or the date on which the defendant had received an extension, to make an income tax return to the Director, Internal Revenue Service Center, at Atlanta, Georgia, or other proper officer of the United States, stating specifically the items of his gross income and any deductions and credits to which he was entitled; that knowing this, he willfully failed to make an income tax return to the Director of the Internal Revenue Service Center, or to any other proper officer of the United States, in violation of Section 7203, Title 26, United States Code.

COUNT 2

During the calendar year 2003, in Rankin County in the Jackson Division of the Southern District of Mississippi, the defendant, **WILEY RANDOLPH KUYRKENDALL**, received gross income of approximately \$159,022.00, which was substantially in excess of the minimum filing requirement of \$15,600.00 for Married Filing Jointly filing status in the calendar year 2003, and that by reason of such gross income, the defendant was required by law, following the close of each calendar year and on or before April 15 of the following year or the date on which the defendant had received an extension, to make an income tax return to the Director, Internal Revenue Service Center, at Atlanta, Georgia, or other proper officer of the United States, stating specifically the items of his gross income and any deductions and credits to which he was entitled; that knowing this, he willfully failed to make an income tax return to the Director of the Internal Revenue Service Center, or to any other proper officer of the United States, in violation of Section 7203, Title 26, United States Code.

COUNT 3

During the calendar year 2004, in Rankin County in the Jackson Division of the Southern District of Mississippi, the defendant, **WILEY RANDOLPH KUYRKENDALL**, received gross income of approximately \$266,168.00, which was substantially in excess of the minimum filing requirement of \$15,900.00 for Married Filing Jointly filing status in the calendar year 2004, and that by reason of such gross income, the defendant was required by law, following the close of each calendar year and on or before April 15 of the following year or the date on which the defendant had received an extension, to make an income tax return to the Director, Internal Revenue Service Center, at Atlanta, Georgia, or other proper officer of the United States, stating specifically the items of his gross income and any deductions and credits to which he was

entitled; that knowing this, he willfully failed to make an income tax return to the Director of the Internal Revenue Service Center, or to any other proper officer of the United States, in violation of Section 7203, Title 26, United States Code.

COUNT 4

During the calendar year 2005, in Rankin County in the Jackson Division of the Southern District of Mississippi, the defendant, **WILEY RANDOLPH KUYRKENDALL**, received gross income of approximately \$261,799.00, which was substantially in excess of the minimum filing requirement of \$16,400.00 for Married Filing Jointly filing status in the calendar year 2005, and that by reason of such gross income, the defendant was required by law, following the close of each calendar year and on or before April 15 of the following year or the date on which the defendant had received an extension, to make an income tax return to the Director, Internal Revenue Service Center, at Austin, Texas, or other proper officer of the United States, stating specifically the items of his gross income and any deductions and credits to which he was entitled; that knowing this, he willfully failed to make an income tax return to the Director of the Internal Revenue Service Center, or to any other proper officer of the United States, in violation of Section 7203, Title 26, United States Code.



STAN HARRIS

Acting United States Attorney

A TRUE BILL:

s/ Signature Redacted

Foreperson of the Grand Jury